

EXHIBIT “E”



E. STEWART

Jones Hacker Murphy LLP

ATTORNEYS & COUNSELORS AT LAW

March 29, 2021

**VIA FEDERAL EXPRESS/
OVERNIGHT MAIL & E-MAIL TO:**

chet@chetminingco.com

Chet Stojanovich
105 Duane Street, Apt. 20F
New York, New York 10007

Chet Stojanovich
Hilton Garden Inn
39 6th Avenue
New York, New York 10013

RE: Alex Holmes, et al. v. Chet Stojanovich, et al. Case No.: 7:20cv04448 and
Andrew Schwartzberg v. Chet Stojanovich, et al. Case No.: 1:20cv01880

Dear Chet:

Pursuant to our conversation of today's date, the deposition in the above referenced matters is hereby adjourned until Thursday, April 1, 2021 at 1:00pm. Enclosed are the modified subpoenas with the amended date. Please provide me with any/all documentation you have in response to the subpoenas by e-mail no later than Wednesday, March 31, 2021 at 5:00pm.

Below is the Zoom link information and a separate dial in number if you are having technical difficulties with Zoom.

Join Zoom Meeting

<https://us04web.zoom.us/j/75560627855?pwd=TIVPYmhiQVFxdkhkN2dDRXhyKzElZz09>

Meeting ID: 755 6062 7855

Passcode: qQn4Sh

Telephone Conference Call in Information: Dial: 1-888-394-8197

Chair Code: 3662934#

Participant's code: 366293#

Please be advised that your failure to fully comply with these subpoenas by not producing these documents demanded and not appearing for a deposition will be met with a motion to hold you in Contempt of Court.

Very truly yours,

E. STEWART JONES HACKER MURPHY LLP

/s/John F. Harwick, Esq.

John F. Harwick, Esq.

jharwick@joneshacker.com

Direct Dial: (518) 213-0113

JFH:dmd

Enclosures

cc: Clients

Susan Florio, Court Reporter

**Please send all mail to:
TROY OFFICE**

28 SECOND STREET
TROY, NY 12180
PHONE: (518) 274-5820

200 HARBORSIDE DRIVE, SUITE 300
SCHENECTADY, NY 12305
PHONE: (518) 783-3843

511 BROADWAY
SARATOGA SPRINGS, NY 12866
PHONE: (518) 584-8886

1659 CENTRAL AVENUE, SUITE 103
ALBANY, NY 12205
PHONE: (518) 486-8800

FAX: (518) 274-5875

www.joneshacker.com

AO 88A (Rev. 12/13) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of New York

ALEX HOLMES, ET AL.

Plaintiff

v.

CHET MINING CO, LLC, CHET MINING CO
CANADA LTD and CHET STOJANOVICH

Defendant

Civil Action No. 7:20-CV-0448-UA

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: CHET MINING CO., LLC, CHET MINING CO CANADA LTD and CHET STOJANOVICH

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: [https://us04web.zoom.us/j/75560627855?](https://us04web.zoom.us/j/75560627855?pwd=TIVPYmhiQVFxdkhkN2dDRXhyKzE1dz09)
 pwd=TIVPYmhiQVFxdkhkN2dDRXhyKzE1dz09
 Meeting ID: 755 6062 7855 Pass: qQn4Sh

Date and Time: Adjourned to
 04/01/2021 1:00 pm

The deposition will be recorded by this method: Stenographer and video

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Exhibit "A" attached hereto. Kindly provide all documents requested two (2) weeks prior to deposition via e-mail to jharwick@joneshacker.com.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/29/2021

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) John F. Harwick,
 Representing all Plaintiffs, who issues or requests this subpoena, are:

E. Stewart Jones Hacker Murphy LLP, 28 Second Street, Troy NY 12180, jharwick@joneshacker.com, (518) 213-0113

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Exhibit A

Produce the following items relating to Chet Mining Co., LLC, Chet Mining Co Canada

LTD and Chet Stojanovich (collectively the "Debtors") for the past six (6) years:

1. All documents showing loans to others;
2. General ledger and checkbooks;
3. Federal and State Income Tax Returns, including all schedules and amendments;
4. Bank account statements (*e.g.*, cash accounts, checking accounts, savings accounts);
5. Certificates of deposit;
6. Balance sheets;
7. A list of assets and/or inventory owned or leased ;
8. Any documents showing monies owed to the Debtors;
9. A list of all accounts receivable, with the debtor's addresses;
10. Documents showing any transactions with insiders (*e.g.* employees, shareholders, members, owners, officers or directors of the Debtors);
11. Financial statements;
12. Deeds to any and all real property owned or controlled;
13. Documents showing ownership, leasing or control of any real property, equipment, boat, aircraft or vehicles;
14. Appraisals of any real or personal property owned;
15. Loan and/or line of credit applications;
16. All audited or unaudited financial statements and disclosures;
17. Audit reports;
18. UCC filings and financing statutes;
19. Payroll account records;
20. Shareholder agreements;
21. Operating agreements of any LLC owned or operated by Debtors;
22. LLC or Corporate minutes, books and records;
23. Insurance policies;
24. Titles to any and all vehicles, boats, aircrafts and/or equipment;
25. Wills;
26. Trusts where the Debtors are beneficiaries or grantors;
27. Retirement account statements;
28. Investment accounts statements;
29. Securities certificates;
30. Stock options;
31. Commodity account statements;
32. Broker margin account statements;
33. Written itemization of all cash and crypto currency held by or on behalf of the Debtors;
34. Safe deposit box records and the contents of safe deposit boxes;
35. Credit card statements and applications;
36. Loan applications;

37. Mortgages, mortgage statements and applications;
38. Loan and line of credit documents and written statements;
39. A statement of net worth;
40. Divorce proceeding records;
41. Contingent interests (*e.g.*, stock options, interests subject to life estates, prospective inheritances);
42. Tax shelter investment records;
43. Debt collection records;
44. Judgments;
45. Pleadings in all lawsuits where the Debtor is a party;
46. Arbitration papers and awards where the Debtor is a party;
47. Documents showing ownership of patents;
48. Documents showing ownership of trademarks;
49. Documents showing ownership of copyrights;
50. Documents showing ownership of intellectual property;
51. Any evidence of gifts to others;
52. All cryptocurrency records/statements;
53. Software and hardware wallets;
54. Warm and cold storage units;
55. Information and statements for all cryptocurrency exchange, brokerage and investments accounts;
56. All mobile devices including phone and/or tablets;
57. All cryptocurrency information contained on servers, computers and laptops;
58. All cloud and edge computing accounting data related to cryptocurrency;
59. All cryptocurrency account information such as Kraken, Coinbase, Gemini, et al;
60. All Keystone files and crypto wallet passphrases; and
61. Any other information, documents or electronic data showing ownership or control of any cryptocurrency.

Deanna Dudley

From: Deanna Dudley
Sent: Monday, March 29, 2021 2:31 PM
To: chet@chetminingco.com
Cc: John Harwick; Alex Holmes; Andrew Schwartzberg; Nico Tramontana; Lars Eller; Brad Yasar; Josh Navarro; Susan Florio, RPR
Subject: Subpoena Deposition-Adjourned to April 1, 2021
Attachments: SUBPOENA-EXECUTED ADJ'D DATE.pdf; SUBPOENA-DEPOSITON-ADJ'D DATE.pdf; 3-29-2021 ltr to chet enc modified subpoenas.pdf

On behalf of John Harwick, please find the attached correspondence with revised subpoenas indicating the new adjourned date of deposition.

Thank you,

Deanna M. Dudley
Paralegal



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